I	Case 09-21423-lbr Doc 47 Entered 10/1	3/09 16:17:08 Page 1 of 2	
1 2 3 4 5 6	PITE DUNCAN, LLP STEVEN W. PITE (NV Bar #008226) EDDIE R. JIMENEZ (NV Bar #10376) EDDIE R. JIMENEZ (NV Bar #10376) 4375 Jutland Drive, Suite 200 P.O. Box 17933 San Diego, CA 92177-0933 Telephone: (702) 413-9692 Facsimile: (619) 590-1385 E-mail: ecfnvb@piteduncan.com ABRAMS & TANKO, LLLP	E-Filed on 10/12/0	09
7 8	MICHELLE L. ABRAMS (NV Bar #005565) 3085 S. Jones Blvd., Suite C Las Vegas, NV 89146		
9	Attorneys for Chevy Chase Bank, FSB		
10			
11	UNITED STATES BANKRUPTCY COURT		
12	DISTRICT OF NEVADA		
13	In re	Bankruptcy Case No. BK-S-09-21423-LBR	
14	BETTY R. HEROLD ,	Chapter 11	
15 16	Debtor(s).	Chevy Chase Bank, FSBREQUEST FOR SPECIAL NOTICE AND SERVICE OF PAPERS AND RESERVATION OF RIGHTS	
17 18	TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR/DEBTORS, AND ALL INTERESTED PARTIES		
19	PLEASE TAKE NOTICE that the firm of PITE DUNCAN, LLP, attorneys for Chevy Chase		
20	Bank, FSBhereby requests special notice of all events relevant to the above-referenced bankruptcy		
21	and copies of all pleadings or documents filed in relation to the above-referenced bankruptcy,		
22	including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule 2002, the		
23	commencement of any adversary proceedings, the filing of any requests for hearing, objections,		
24	and/or notices of motion, or any other auxiliary filings, as well as notice of all matters which must be		
25	noticed to creditors, creditors committees and parties-in-interest and other notices as required by the		
26	United States Bankruptcy Code and Rules and/or Local Rules of the above-referenced bankruptcy		
27	court.		
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1	PITE DUNCAN, LLP, requests that for all notice purposes and for inclusion in the Master			
2	Mailing List in this case, the following address be used:			
3	Eddie R. Jimenez PITE DUNCAN, LLP			
4	4375 Jutland Drive, Suite 200 P.O. Box 17933			
5	San Diego, CA 92177-0933			
6	Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,			
7	proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a waiver of the within party's: a. Right to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Court Judge;			
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11				
12	b. Right to trial by jury in any proceeding as to any and all matters so triable herein,			
13	whether or not the same be designated legal or private rights, or in any case, controversy or			
14	proceeding related hereto, notwithstanding the designation or not of such matters as "core			
15	proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant			
16	to statute or the United States Constitution;			
17	c. Right to have the reference of this matter withdrawn by the United States District			
18	Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to			
19				
20	which this party is entitled under any agreements at law or in equity or under the United States			
21	Constitution.			
22	All of the above rights are expressly reserved and preserved by this party without			
23	exception and with no purpose of confessing or conceding jurisdiction in any way by this filing			
24	or by any other participation in these matters.			
25	Dated: October 12, 2009 /s/ Eddie R. Jimenez			
26	4375 Jutland Drive, Suite 200 P.O. Box 17933			
27	San Diego, CA 92177-0933 (702) 413-9692			
28	NV Bar #10376 Attorney for Chevy Chase Bank, FSB			